

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

| | | |
|---|---|--------------------------------|
| AVONDA URBEN, on behalf of herself and in her capacity as the Sellers' Representative, |) | |
| |) | |
| |) | |
| <i>Plaintiff</i> |) | |
| |) | |
| |) | |
| |) | |
| v. |) | Civ. No. 1:23-cv-00138-TSE-IDD |
| |) | |
| GRIDKOR, LLC, <i>et al</i> |) | |
| |) | |
| <i>Defendants</i> |) | |
| |) | |
| |) | |
| GRIDKOR, LLC, |) | |
| |) | |
| <i>Counterclaim and Third-Party Plaintiff</i> |) | |
| |) | |
| v. |) | |
| |) | |
| AVONDA URBEN; JOHN DOE NOS. 1-5; and JANE DOE NOS. 1-5, |) | |
| |) | |
| <i>Counterclaim and/or Third Party Defendants</i> |) | |
| |) | |

**MEMORANDUM IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL FOR
PLAINTIFF/COUNTERCLAIM DEFENDANT AVONDA URBEN**

Pursuant to Local Rules of Civil Procedure 7 and 83.1(H), Alex Heidt and The Heidt Law Firm, PLLC (collectively, “Heidt”) respectfully move to withdraw as counsel for Plaintiff/Counterclaim Defendant Avonda Urben (“Urben”). Good cause exists to permit Heidt to withdraw as counsel for Urben in this matter, the underlying reasons of which are protected by the attorney-client privilege. Courts in the Eastern District of Virginia generally consider in the context of a motion to withdraw whether the Virginia Rules of Professional Conduct permit withdrawal, whether withdrawal of counsel is for good cause, and whether withdrawal will

disrupt the prosecution of the case. *See Wallace v. City of Hampton*, No. 2:15-CV- 126, 2017 WL 11505960, at *6 (E.D. Va. July 21, 2017). Under Virginia Rule of Professional Conduct 1.16, Heidt may withdraw from representing Urben in this matter. Neither the parties nor the proceeding will be disrupted by Heidt's withdrawal. Pursuant to Virginia Rule of Professional Conduct 1.16(c) and Local Rule of Civil Procedure 83.1(H), Heidt has provided reasonable notice to Urben of its withdrawal. In addition, a copy of the Motion to Withdraw and supporting papers have been emailed to Urben, and her other counsel.

WHEREFORE, Heidt respectfully requests that the Court grant the Motion to Withdraw and enter an Order permitting Heidt to withdraw as counsel for Urben.

Dated May 3, 2024

Respectfully Submitted,

_____/s/_____

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of May 2024, I filed the foregoing Motion to Withdraw using the Court's CM/ECF system, which will send a notice of electronic filing to:

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